

James R. Condo (#005867)
Amanda C. Sheridan (#027360)
SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
asheridan@swlaw.com

Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
Elizabeth C. Helm (admitted *pro hac vice*)
Georgia Bar No. 289930
NELSON MULLINS RILEY & SCARBOROUGH LLP
Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com
kate.helm@nelsonmullins.com

Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation

No. 2:15-MD-02641-DGC

**DEFENDANTS' REPLY IN SUPPORT
OF MOTION TO SEAL
DOCUMENTS LODGED UNDER
SEAL BY PLAINTIFFS IN SUPPORT
OF OMNIBUS STATEMENT OF
FACTS IN SUPPORT OF
RESPONSES TO DEFENDANTS'
MOTIONS FOR SUMMARY
JUDGMENT IN THE BELLWETHER
CASES**

(Assigned to the Honorable David G.
Campbell)

1 Plaintiffs in support of their Omnibus Statement of Facts filed in Support of their
2 Responses to the Motions for Summary Judgment in the Bellwether cases.

3 In response to the documents filed under seal, Bard reviewed the voluminous
4 documents and addressed all of the documents in one of three ways:

- 5 1. Bard redacted the confidential information and filed the redacted documents.
6 (Doc. 8443). As Plaintiffs acknowledged, this was 58 documents.
- 7 2

CONCLUSION

Therefore, compelling reasons exist for protection of Bard's documents, and the Court should grant Bard's Motion to Seal for the documents at issue. Further, the redactions and sealed documents do not impair the ability of the public to understand the judicial process, Bard's motions or any ruling by the Court. As such, Bard respectfully requests that the Court enters an Order sealing the redactions in documents filed redacted in Doc. 8443 and the documents Bard seeks to seal.

This 1st day of December

